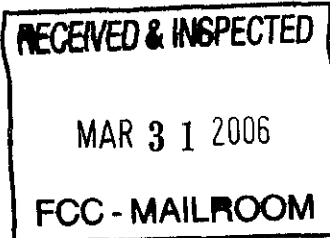




91-270

City of Tacoma
Public Safety Radio Operations
747 Market Street, Room 744
Tacoma, WA 98402
(253) 404-3790



Date December 26, 2003
Memo To Marlene H. Dortch, Secretary / Federal Communications Commission
From Steve Taylor
Subject Region 43 RPC changes to 800 MHz Plan
Copy
Attachments March 27 Region 43 Letters regarding plan changes (2)
Region 35 concurrence letters (2)
Region 12 concurrence letter (1)

Ms. Dortch, attached are letters sent to your attention today via FedEx (tracking number 841848243029) regarding changes in zone representation and filing windows for the Region 43 800 MHz plan. Copies of these letters were also filed today via ECFS and emailed to Joy Alford at Joy.Alford@fcc.gov

Best regards


Steve Taylor

Chair, Region 43 Regional Planning Committee, 800 MHz

No. of Copies rec'd 042
List A B C D E

NPSPAC Region 43 Regional Planning Committee

c/o Steve Taylor, Chairperson

City of Tacoma

747 Market Street, Room 744

Tacoma, WA 98402

Phone: 253-404-3790

Email: staylor2@ci.tacoma.wa.us

Web Site: www.region43.org

March 27, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RECEIVED & INSPECTED

MAR 31 2006

FCC - MAILROOM

RE: Region 43 800 MHz NPSPAC Plan – PR Docket 91-270

Dear Ms. Dortch,

When the Region 43 800 MHz Plan was originally adopted the Committee established a framework for handling requests for channel assignments on a semi-annual basis. At that time it was believed that we would have numerous competing applications for the limited spectrum at our disposal in the urbanized areas that lie in Canadian Border Sharing Region 5, and we felt that having these two prescribed filing windows would allow us to concentrate applications together and apply scoring criteria so that the most appropriate allocation of spectrum could take place given the Plan parameters.

While this process has served us well, we now find that with the spectrum fully deployed in virtually all the urbanized areas in the Region we have a growing number of small 'filler site' applications needing processed by incumbent licensees. Often these have very low coverage profiles and can be met with careful engineering of close-spaced channel adjacencies. Licensees in the Region find it cumbersome to have to wait for the semi-annual filing windows.

We also now face the impacts of the 800 MHz re-banding effort. Of particular importance is that Region 43 (in Wave 4 due to being a Canadian border area) borders Region 35 (Oregon) which is in Wave 1. Given that both Regions have several systems in the border area with overlapping coverage (some even have sites on the other side of the Columbia river to provide coverage back across to their jurisdiction) we find that there will need to be a number of license modifications by incumbents in Region 43, both in preparation for re-banding and then in the re-banding process itself.

Therefore, at the April 27, 2005 and June 29, 2005 meetings of the Committee, we discussed the need to end the semi-annual filing window concept and begin processing requests for channel assignments on a monthly basis. This was formalized in a Motion at our June 29, 2005 meeting that passed unanimously.

Currently, Section III D of the Plan reads as follows:

D. APPLICATION FILING WINDOWS AND CRITERIA FOR PRIORITIZATION

Applications for frequencies covered by this Plan will be processed by the Regional Review Committee two (2) times per year. These periods will be referred to as Filing Windows. The purpose of processing applications in this manner is to allow the Committee to better understand the needs of the applicants and make informed decisions on the distribution of frequencies where the demand exceeds the supply. The deadline for applications for each Filing Window will be March 31 and September 30. The Committee shall review all applications received by these dates and act on these no later than May 31 and November 30, respectively. Deliberations may include meetings where the Committee takes testimony from interested parties. Further details will be defined in the Committee's Application Review Procedures document.

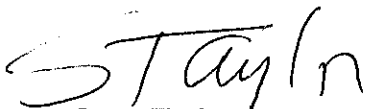
We propose to revise this to read as follows:

Applications for frequencies covered by this Plan will be processed by the Regional Planning Committee at any formally called meeting of the Committee, typically monthly. Any applications received more than five (5) working days in advance of the scheduled meeting will be considered at that meeting, but final decision may be delayed until subsequent meetings if further facts or information are needed by the Committee to make a decision. Applications received five (5) working days or less before the meeting will be heard at the subsequent meeting. Further details will be defined in the Committee's Application Review Procedures document.

In addition to the actions at the April and June meetings, the Committee reviewed this specific language at their July 27, 2005 meeting and unanimously approved it for transmittal to the FCC for acceptance. Subsequent to this action, concurrence letters were requested from our two border regions, Region 12 (Idaho) and Region 35 (Oregon). Copies of those concurrence letters are attached for your reference.

Please advise me of any further information you need to allow the FCC to expeditiously process and approve this Plan Revision for Region 43.

Sincerely,

A handwritten signature in black ink, appearing to read "STaylor". The signature is stylized with a large "S" and a cursive "Taylor".

Steve Taylor
Region 43 800 MHz Chair

Oregon Region 35 NPSPAC
Frequency Advisory Committee
3732 SE 99th Avenue
Portland, Oregon 97266-2505

October 28, 2005

RE: Region 35 800MHz Regional Planning Committee letter of concurrence for Region 43's 800MHz NPSPAC plan revision.

Dear Sir or Madam:

The Region 35 NPSPAC Frequency Review Committee approves the following changes to Region 43's NPSPAC plan.

Currently, Section III D of the Plan reads as follows:

D. APPLICATION FILING WINDOWS AND CRITERIA FOR PRIORITIZATION

Applications for frequencies covered by this Plan will be processed by the Regional Review Committee two (2) times per year. These periods will be referred to as Filing Windows. The purpose of processing applications in this manner is to allow the Committee to better understand the needs of the applicants and make informed decisions on the distribution of frequencies where the demand exceeds the supply. The deadline for applications for each Filing Window will be March 31 and September 30. The Committee shall review all applications received by these dates and act on these no later than May 31 and November 30, respectively. Deliberations may include meetings where the Committee takes testimony from interested parties. Further details will be defined in the Committee's Application Review Procedures document.

Region 43's proposes the following revisions:

Applications for frequencies covered by this Plan will be processed by the Regional Planning Committee at any formally called meeting of the Committee, typically monthly. Any applications received more than five (5) working days in advance of the scheduled meeting will be considered at that meeting, but final decision may be delayed until subsequent meetings if further facts or information are needed by the Committee to make a decision. Applications received five (5) working days or less before the meeting will be heard at the subsequent meeting. Further details will be defined in the Committee's Application Review Procedures document.

Sincerely,



David Brooks
Region 35 NPSPAC Chairman

David Brooks
Region 35 NPSPAC Chairman
Office: (503) 823-4767
Fax: (503) 823-4185
e-mail: dbrooks@ci.portland.or.us

City of Portland
3732 SE 99th Ave
Portland, OR 97216-2505

NPSPAC Region 12 Regional Review Committee

c/o Stan Passey, Chairperson
Idaho State Police
700 S. Stratford Dr.
Meridian, ID 83642

November 28, 2005

Kevin Kerns Region 43 Chairperson
King County Information and Telecommunications Services Division
700 5th Avenue, Suite 2300
Seattle, WA 98104-5002

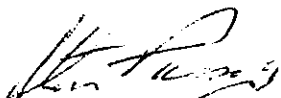
RE: Region 43 800 MHz NPSPAC Plan Revisions

Dear Kevin,

The Idaho review committee has reviewed the included two documents, for reference, containing revision requests to the Region 43 800 MHz plan dated July 25, 2005 addressed to the Federal Communications Commission.

Region 12 concurs with Region 43 in regard to membership and channel assignment changes to their 800 MHz plan.

Regards,



Stan Passey
NPSPAC, Region 12, Chairperson

NPSPAC Region 43 Regional Planning Committee

c/o Steve Taylor, Chairperson

City of Tacoma

747 Market Street, Room 744

Tacoma, WA 98402

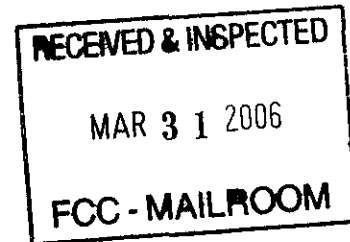
Phone: 253-404-3790

Email: staylor2@ci.tacoma.wa.us

Web Site: www.region43.org

March 27, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554



RE: Region 43 800 MHz NPSPAC Plan – PR Docket 91-270

Dear Ms. Dortch,

When the Region 43 800 MHz Plan was originally adopted the State was divided into six (6) Zones and one representative from each Zone (with the exception of Zone 2 which had three representatives due to its high population) was elected by the eligible licensees in the Zone to sit on what was referred to as the Regional Review Committee. In addition to these Zone representatives, the Committee also included the APCO Frequency Advisors and a single representative from State government agencies. This process worked well in the early years of the Plan, but as the utilization of 800 MHz spectrum continued to concentrate around the urban areas, participation from the rural areas fell off. This made it difficult at times for the Committee to form a Quorum and to act on matters at hand.

The present text of the Region 43 800 MHz Plan is as follows:

A. REGIONAL REVIEW COMMITTEE

1. Membership

For the purpose of this Plan, and to establish a basis for membership in the Region 43 Regional Review Committee, Washington State has been divided into six zones: three zones west of the Cascade Mountains and three zones east of the Cascade Mountains.

The zones are composed of Counties which are divided as follows:

- Zone 1. Whatcom, Skagit, Island, and San Juan Counties
- Zone 2. Snohomish, King, Kitsap, Thurston, and Pierce Counties
- Zone 3. Clallam, Jefferson, Mason, Grays Harbor, Cowlitz, Lewis, Pacific, Wahkiakum, Clark, and Skamania Counties.
- Zone 4. Kittitas, Grant, Douglas, Chelan, and Okanogan Counties.
- Zone 5. Yakima, Klickitat, Benton, Franklin, Walla Walla, Columbia, Garfield, and Asotin Counties.
- Zone 6. Ferry, Stevens, Pend Oreille, Spokane, Lincoln, Adams, and Whitman Counties.

The voting membership of the Regional Review Committee shall total eleven (11) and be distributed as follows:

- One member each from Zones 1, 3, 4, 5 and 6.
- Three members from Zone 2 (which encompasses the largest population in the region).
- The two designated local APCO Public Safety Frequency Advisors (one from eastern Washington and one from western Washington).
- One member to represent Washington State agencies (who provide services statewide and therefore are in all zones).

When the Region 43 700 MHz Regional Planning Committee was formed, the Zone concept was considered but rejected due to the experiences of the 800 MHz Committee. Instead, the 700 MHz Plan allows any eligible licensee in the band to name a voting member to the Committee. This concept has been working well for the 700 MHz Committee, and is therefore also adopted for this 800 MHz Plan.

At the June 29, 2005 meeting of the Committee this issue was discussed and a Motion was passed unanimously to file a Plan amendment to end the Zone concept and adopt the membership model used in the 700 MHz Plan. The language from Section A-1 of the Plan would be modified to read as follows:

Voting members shall consist of one official from any non-federal single agency engaged in public safety eligible to hold a license under 47 CFR 90.20. Voting members shall be designated in writing to the chair by an official from the eligible agency who is at least one-level senior in the reporting structure of the agency to the designated voting member.


Except that a single agency shall be allowed no more than one vote for each distinct eligibility category (e.g. police, fire, EMS, highway) within the agency's organization of political jurisdiction. In voting on any issue the individual must identify himself/herself and the agency and eligibility category which he or she represents.

Non-Voting members are all others interested in furthering the goals of public safety communications, including vendor representatives.

At the July 27, 2005 meeting of the Committee this language was reviewed again and approved for transmittal as a Plan Amendment by a unanimous vote. Subsequent to this action, concurrence letters were requested from our two border regions, Region 12 (Idaho) and Region 35 (Oregon). Copies of those concurrence letters are attached for your reference.

Please advise me of any further information you need to allow the FCC to expeditiously process and approve this Plan Amendment for Region 43.

Sincerely,



Steve Taylor
Region 43 800 MHz Chair

Oregon Region 35 NPSPAC
Frequency Advisory Committee
3732 SE 99th Avenue
Portland, Oregon 97266-2505

October 28, 2005

RE: Region 35 800MHz Regional Planning Committee letter of concurrence for Region 43's 800MHz NPSPAC plan revision.

Dear Sir or Madam:

The Region 35 NPSPAC Frequency Review Committee approves the following changes to Region 43's NPSPAC plan.

The present text of the Region 43 800 MHz Plan is as follows:

A. REGIONAL REVIEW COMMITTEE

1. Membership

For the purpose of this Plan, and to establish a basis for membership in the Region 43 Regional Review Committee, Washington State has been divided into six zones: three zones west of the Cascade Mountains and three zones east of the Cascade Mountains.

The zones are composed of Counties which are divided as follows:

- Zone 1. Whatcom, Skagit, Island, and San Juan Counties
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- Zone 5. Yakima, Klickitat, Benton, Franklin, Walla Walla, Columbia, Garfield, and Asotin Counties.
- Zone 6. Ferry, Stevens, Pend Oreille, Spokane, Lincoln, Adams, and Whitman Counties.

The voting membership of the Regional Review Committee shall total eleven (11) and be distributed as follows:

- One member each from Zones 1, 3, 4, 5 and 6.
- Three members from Zone 2 (which encompasses the largest population in the region).
- The two designated local APCO Public Safety Frequency Advisors (one from eastern Washington and one from western Washington).
- One member to represent Washington State agencies (who provide services statewide and therefore are in all zones).

David Brooks
Region 35 NPSPAC Chairman
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e-mail: dbrooks@ci.portland.or.us

City of Portland
3732 SE 99th Ave
Portland, OR 97216-2505

Oregon Region 35 NPSPAC
Frequency Advisory Committee
3732 SE 99th Avenue
Portland, Oregon 97266-2505

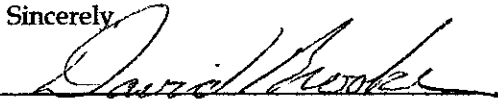
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Voting members shall consist of one official from any non-federal single agency engaged in public safety eligible to hold a license under 47 CFR 90.20. Voting members shall be designated in writing to the chair by an official from the eligible agency who is at least one-level senior in the reporting structure of the agency to the designated voting member.

Except that a single agency shall be allowed no more than one vote for each distinct eligibility category (e.g. police, fire, EMS, highway) within the agency's organization of political jurisdiction. In voting on any issue the individual must identify himself/herself and the agency and eligibility category which he or she represents.

Non-Voting members are all others interested in furthering the goals of public safety communications, including vendor representatives.

Sincerely,



David Brooks
Region 35 NPSPAC Chairman

David Brooks
Region 35 NPSPAC Chairman
Office: (503) 823-4767
Fax: (503) 823-4185
e-mail: dbrooks@ci.portland.or.us

City of Portland
3732 SE 99th Ave
Portland, OR 97216-2505

NPSPAC Region 12 Regional Review Committee

c/o Stan Passey, Chairperson
Idaho State Police
700 S. Stratford Dr.
Meridian, ID 83642

November 28, 2005

Kevin Kerns Region 43 Chairperson
King County Information and Telecommunications Services Division
700 5th Avenue, Suite 2300
Seattle, WA 98104-5002

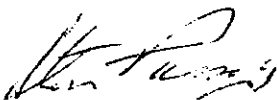
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Region 12 concurs with Region 43 in regard to membership and channel assignment changes to their 800 MHz plan.

Regards,



Stan Passey
NPSPAC, Region 12, Chairperson